

**AIR POLLUTION CONTROL DISTRICT
COUNTY OF SAN DIEGO**

**DRAFT PROPOSED PLANS FOR ATTAINING THE
STATE AND NATIONAL OZONE AMBIENT AIR QUALITY STANDARDS
IN SAN DIEGO COUNTY**

WORKSHOP REPORT

The San Diego County Air Pollution Control District (District) conducted a public workshop on September 8, 2016, to present and receive input on: (1) a draft proposed update of the Regional Air Quality Strategy (RAQS) for attaining California's ozone standards; and (2) a draft proposed State Implementation Plan (SIP) for attaining the 2008 national ozone standard. Advance notice of the workshop was sent to all air quality permit holders, economic development corporations and chambers of commerce in the region, to the California Air Resources Board (ARB), the U.S. Environmental Protection Agency (EPA), and other interested parties.

The workshop was attended by 28 people representing local businesses, government agencies, and other organizations. Verbal comments were received during the workshop and written comments were received afterwards. Following is a summary of those comments and the District's responses.

COMMENTS ON THE DRAFT PROPOSED RAQS REVISION

1. WORKSHOP COMMENT

Emissions from stationary and areawide sources are projected to remain fairly constant through 2035, according to Figures 6 and 7 in the proposed RAQS Revision. Why is that? Does this information reflect the benefits of recent legislation to reduce greenhouse gas (GHG) emissions, e.g., Senate Bill 32 (Pavley, 2016)?

DISTRICT RESPONSE

The District's rules to reduce ozone-forming emissions from stationary sources have mostly been fully implemented, providing substantial emission reductions in the past and largely mitigating the emission impacts of projected regional growth in the future. Nevertheless, it is possible that future emissions from stationary sources could be lower than illustrated in Figures 6 and 7, which do not reflect the benefits of proposed measures in the draft RAQS revision, possible additional measures that could become feasible in the future, or the latest climate legislation that requires future reductions in total statewide GHG emissions.

It is worth noting that some statewide measures to reduce GHG emissions could have unintended consequences of increasing ozone-forming emissions in the region, which further demonstrates the need for coordinated planning at the state and local levels. For example, diverting green waste from landfills will reduce landfill GHG emissions, but will indirectly increase VOC

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emissions due to increased composting activity. Accordingly, the draft RAQS revision includes a proposed measure to control VOC emissions from certain non-residential composting operations, which are expected to increase in response to the state's waste diversion mandates.

2. WORKSHOP COMMENT

Do the emission trends presented in Figures 6 and 7 of the RAQS reflect statewide or only San Diego County emissions?

DISTRICT RESPONSE

The emission trends presented in Figures 6 and 7 are specific to San Diego County.

3. WORKSHOP COMMENT

Is the District still required to adopt "all feasible measures" to further reduce stationary source emissions, even if total regionwide emissions were reduced by more than 5 percent per year?

DISTRICT RESPONSE

Yes, the state requirement to adopt all feasible measures applies to regions such as San Diego that are not implementing the state's no-net-increase program, which would obligate a large number of new and expanding facilities to provide costly emission reduction offsets. Consequently, this all feasible measures requirement applies regardless of the total regionwide emission reductions achieved in the region.

4. WORKSHOP COMMENT

Will the proposed tighter NOx emissions standard in the future draft amendments to Rule 69.4.1 apply only to new stationary engines purchased in San Diego County, or apply regardless of where the new engine was purchased?

DISTRICT RESPONSE

The future draft amendments to Rule 69.4.1, as currently envisioned, would apply to new stationary engines installed in San Diego County, regardless of where the units were purchased. This regulatory approach is preliminary and will be further evaluated during a future rule development process, including public review.

5. WORKSHOP COMMENT

Will the future draft amendments to Rule 69.2.1 (to regulate new boilers of additional sizes) require boiler operators to obtain an air quality permit?

DISTRICT RESPONSE

The future draft amendments to Rule 69.2.1, as currently envisioned, would not require boiler operators to obtain a District permit. Rather, boiler manufacturers would be required to certify that their new boilers comply with the emission limits of the rule. This regulatory approach is preliminary and will be further evaluated during a future rule development process, including public review.

6. WORKSHOP COMMENT

Does the draft RAQS revision provide for attainment of the state ozone standards?

DISTRICT RESPONSE

State law does not require a demonstration or projection of attainment of the state ozone standards. Rather, it requires the plan to be designed to achieve the state standards by the earliest practicable date through expeditious adoption of every feasible measure to reduce ozone-forming emissions. The draft RAQS revision meets this requirement.

7. SAN DIEGO ASSN. OF GOVERNMENTS (SANDAG) WRITTEN COMMENT

SANDAG will provide updated Transportation Control Measure (TCM) information to incorporate in the District's final proposed RAQS revision.

DISTRICT RESPONSE

SANDAG's assistance in providing updated TCM information is appreciated. The updated information will be included in the final proposed RAQS revision.

8. ARB WRITTEN COMMENT

ARB reviewed the draft RAQS revision and has no comments at this time.

DISTRICT RESPONSE

ARB's timely review of the draft RAQS revision is appreciated.

COMMENTS ON THE DRAFT PROPOSED SIP

9. WORKSHOP COMMENT

Do the emission estimates in the draft SIP reflect the military's "Pacific pivot" strategy involving relocation of military assets from the east coast to the San Diego region?

DISTRICT RESPONSE

Yes, military sources have confirmed that the emission estimates included in the draft SIP account for the "Pacific pivot" strategy.

10. WORKSHOP COMMENT

Is the entire San Diego region considered an ozone nonattainment area, even though only one air monitoring station (located in Alpine) has recorded an ozone violation?

DISTRICT RESPONSE

Yes, pursuant to federal requirements, the entire air basin (i.e., all of San Diego County) is designated an ozone nonattainment area. Ozone is a regional air pollutant that is formed downwind of sources of VOC and NOx emissions. Consequently, an ozone violation at only one monitor will lead to a nonattainment designation for the entire region.

11. WORKSHOP COMMENT

Has San Diego County experienced any exceedances of the 2008 national ozone standard in 2016?

DISTRICT RESPONSE

Yes, the air monitoring station in Alpine has recorded exceedances of the 2008 ozone standard in 2016, based on preliminary air quality measurement data. However, this air quality measurement data is not official until it has passed a federally mandated data validation process, to be completed in early 2017.

12. WORKSHOP COMMENT

Is it possible that the final ozone simulation modeling results will *not* show attainment of the 2008 national ozone standard in 2017?

DISTRICT RESPONSE

The District has received final results from the ozone simulation model, which predict attainment of the 2008 national ozone standard in 2017. This modeled attainment test is supplemented by a proposed “weight of evidence” analysis, which considers trends in air quality, emissions, and meteorology and provides additional support for timely attainment.

13. WRITTEN COMMENT

A measure to control emissions from residential wood combustion should be included in the Reasonably Available Control Technology (RACT) Demonstration. A program that provides EPA-certified wood burning fireplace retrofits would yield significant and cost-effective emission reductions in San Diego County.

DISTRICT RESPONSE

Inclusion of the recommended measure in the RACT Demonstration is not warranted. Ozone violations typically occur in the warmer spring and summer seasons, when residential fireplace activity is at a minimum. Residential wood combustion has not been identified as a substantial regionwide source of ozone-forming emissions, nor has a federal Control Techniques Guideline document been established to require ozone-forming emission reductions from residential wood combustion. Additionally, this source category is considered an “areawide” (not “stationary”) source, which is not subject to federal RACT requirements for ozone. Furthermore, census data indicate that a significant share of residential wood burning activities in the region occurs on tribal lands, over which the District has no jurisdiction and a control measure would have no effect.

14. SANDAG WRITTEN COMMENT

SANDAG will provide updated TCM information to incorporate in the District’s final proposed Attainment Plan.

DISTRICT RESPONSE

SANDAG’s assistance in providing updated TCM information is appreciated. The updated information will be included in the final proposed Attainment Plan.

15. EPA WRITTEN COMMENT

The EPA requested specific clarification in the RACT Demonstration on Rules 59, 59.1, 67.5, 69.2.2 (future proposed), 69.4, and 69.4.1.

DISTRICT RESPONSE

EPA's timely review of the draft documents is appreciated. The District will incorporate the requested information in the proposed final RACT analysis, as appropriate.

16. ARB WRITTEN COMMENT

The ARB requests an opportunity to review (1) the final results of the ozone simulation model and (2) a summary of the outcome of the District's public workshop held in September 2016.

DISTRICT RESPONSE

The Attainment Demonstration chapter of the proposed SIP, including the ozone simulation modeling results, will be posted on the District's website and included in the information presented for the Board's consideration at a noticed public hearing on December 14, 2016. This information is subject to a 30-day public review period prior to the hearing.

A copy of this workshop report will be provided to the ARB, EPA and workshop attendees. It will also be included in the information presented for consideration by the Air Pollution Control Board.

17. SAN DIEGO COUNTY REG. AIRPORT AUTHORITY WRITTEN COMMENTS

The San Diego County Regional Airport Authority (Authority) submitted the following three comments. First, the San Diego International Airport (SDIA) emissions inventory document, prepared by the Authority for the District, should be included as an attachment to the proposed Attainment Plan to ensure the appropriate emissions are specifically tied to the SDIA. Second, the estimated total regionwide emissions from ground support equipment (GSE) are lower than the emissions estimate provided only for SDIA's GSA operations, and thus should be updated to reflect the GSE emissions at SDIA and other airports in the region. Third, additional detail should be provided on GSE, Auxiliary Power Units (APU's), construction projects, and fuel storage tank emissions.

DISTRICT RESPONSE

The Authority's submittal of SDIA emissions information and its timely review of the draft proposed SIP documents is appreciated. The District will include the SDIA's emissions information as an attachment to the final proposed Attainment Plan.

The District agrees that ARB's initial estimate for total regionwide GSE emissions was lower than the Authority's emissions estimate specifically for SDIA's GSE operations, and therefore required updating. ARB's initial estimate for total regionwide GSE emissions in 2020 was estimated at 0.040 ton of VOC per day and 0.218 ton of NOx per day. To fully account for the estimated SDIA GSA emissions, the District added 0.008 ton of VOC per day and 0.295 ton of NOx per day to the 2020 emissions inventory in the Attainment Plan, on top of the ARB's regionwide GSE emissions estimate. As noted in the Attainment Plan, the emissions estimate reflects full-build out of the SDIA in 2020. Because the overwhelming majority of GSE equipment in the region operates solely at the SDIA, any potential additional emissions emanating from GSE located at other airports are considered negligible.

The District will discuss the finding above with SDIA staff, and provide them with the requested additional detail for the specified categories to further explain how the emissions growth was calculated.

18. MILITARY WRITTEN COMMENT

Military representatives reviewed the documents and had no comments at this time.

DISTRICT RESPONSE

The military's timely review of the draft documents is appreciated.

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10/13/16